

Jonathan J. Belaga, Esq. (SBN 275229)
E-mail: jbelega@skanewilcox.com
SKANE MILLS LLP
33 New Montgomery Street, Suite 1250
San Francisco, CA 94105
Tel: 415.431.4150 Fax: 415.431.4151

Gregory B. Thomas (SBN 239870)
E-mail: gthomas@bwslaw.com
Temitayo O. Peters (SBN 309913)
E-mail: tpeters@bwslaw.com
BURKE, WILLIAMS & SORENSEN, LLP
1999 Harrison Street, Suite 1650
Oakland, CA 94612-3520
Tel: 510.273.8780 Fax: 510.839.9104

Attorneys for Defendants
ALAMEDA COUNTY SHERIFF'S OFFICE,
ALAMEDA COUNTY, DEPUTY JOE, and
DEPUTY IGNONT (collectively "ALAMEDA
COUNTY DEFENDANTS")

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO/OAKLAND DIVISION

**ALAMEDA COUNTY MALE
PRISONERS** And Former Prisoners,
DANIEL GONZALEZ, et al. on behalf of
themselves and others similarly situated, as
a Class, and Subclass;

**ALAMEDA COUNTY FEMALE
PRISONERS** And Former Prisoners,
JACLYN MOHRBACHER, ERIN ELLIS,
DOMINIQUE JACKSON, CHRISTINA
ZEPEDA, ALEXIS WAH, AND KELSEY
ERWIN, et al on behalf of themselves and
others similarly situated,

Plaintiffs,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy
Joe, Deputy Ignont (sp) John and Jane
ROEs, Nos. 1 – 25;

WELL-PATH MANAGEMENT, INC., a
Delaware Corporation, (formerly known as

Case No. 3:19-cv-07423-JSC

**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF ALAMEDA COUNTY
DEFENDANTS' SUPPLEMENTAL BRIEF
IN OPPOSITION OF PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

1 California Forensic Medical Group) a
 2 corporation; its Employees and Sub-
 3 Contractors, and Rick & Ruth ROEs
 4 Nos.26-50;

5 ARAMARK CORRECTIONAL
 6 SERVICES, LLC, a Delaware Limited
 7 Liability Company; its Employees and
 8 Sub-Contractors, and Rick & Ruth ROES
 9 Nos. 51-75,

10 Defendants.

11 Defendants ALAMEDA COUNTY SHERIFF’S OFFICE, ALAMEDA COUNTY,
 12 DEPUTY JOE, and DEPUTY IGNONT (hereinafter collectively, “Alameda County
 13 Defendants”), by and through their attorney, hereby request the Court to take judicial notice,
 14 pursuant to Federal Rule of Evidence 201, of the following document:

15 1. Consent Decree, filed in U.S.D.C. Northern District of California Case No. 5:18-
 16 CV-07677 [Dkt. No. 266-1], and Court approval of same [Dkt. Nos. 436, 437]. True and correct
 17 copies of these documents are attached hereto as **Exhibit “A.”** *See EduMoz, LLC v. Republic of*
 18 *Mozambique*, 968 F.Supp.2d 1041, 1049 (C.D. Cal. 2013) (citing *U.S. v. Bernal-Obeso*, 989 F.2d
 19 331, 333 (9th Cir. 1993) (judicial notice of court records is appropriate).

20 2. Alameda County Sheriff’s Office, Detentions and Corrections, Policy and
 21 Procedure 15.01, publically available via the following website:
 22 <https://www.alamedacountysheriff.org/about-us/public-policies>. A true and correct copy of
 23 Policy and Procedure 15.01 is attached here as **Exhibit “B.”** *See Threshold Enterprises Lt. v.*
 24 *Pressed Juicery, Inc.*, 35 F.Supp.3d 139, 145 (N.D. Cal. 2020) (noting that “websites and their
 25 contents may be judicially notice”).

26 3. Alameda County Sheriff’s Office, Detentions and Corrections, Policy and
 27 Procedure 15.02, publically available via the following website:
 28 <https://www.alamedacountysheriff.org/about-us/public-policies>. A true and correct copy of
 Policy and Procedure 15.02 is attached here as **Exhibit “C.”** *See Threshold Enterprises*, 35
 F.Supp.3d at 145 (noting that “websites and their contents may be judicially notice”).

4. Alameda County Sheriff’s Office, Detentions and Corrections, Policy and

1 Procedure 15.03, publically available via the following website:

2 <https://www.alamedacountysheriff.org/about-us/public-policies>. A true and correct copy of
3 Policy and Procedure 15.03 is attached here as **Exhibit “D.”** *See Threshold Enterprises*, 35
4 F.Supp.3d at 145 (noting that “websites and their contents may be judicially notice”).

5 5. Alameda County Sheriff’s Office, Detentions and Corrections, Policy and
6 Procedure 10.05, publically available via the following website:

7 <https://www.alamedacountysheriff.org/about-us/public-policies>. A true and correct copy of
8 Policy and Procedure 10.05 is attached here as **Exhibit “E.”** *See Threshold Enterprises*, 35
9 F.Supp.3d at 145 (noting that “websites and their contents may be judicially notice”).

10 6. Alameda County Sheriff’s Office, Detentions and Corrections, Policy and
11 Procedure 10.03, publically available via the following website:

12 <https://www.alamedacountysheriff.org/about-us/public-policies>. A true and correct copy of
13 Policy and Procedure 10.03 is attached here as **Exhibit “F.”** *See Threshold Enterprises*, 35
14 F.Supp.3d at 145 (noting that “websites and their contents may be judicially notice”).

15 Dated: March 9, 2023

17 By: /s/ Temitayo O. Peters

18 Jonathan J. Belaga
19 SKANE MILLS LLP

20 Gregory B. Thomas
21 Temitayo O. Peters
22 BURKE, WILLIAMS & SORENSEN,
23 LLP

24 Attorneys for Defendants
25 ALAMEDA COUNTY SHERIFF’S
26 OFFICE, ALAMEDA COUNTY,
27 DEPUTY JOE, and DEPUTY IGNONT
28